

# **Exhibit B**

**Gore, John M.**

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**From:** Gore, John M.  
**Sent:** Wednesday, August 10, 2022 3:51 PM  
**To:** 'Raymond Audain'; Santino Coleman; Trinkley, Jane; MMoore@nexsenpruet.com; Rob Tyson; Hollingsworth, Jennifer J.; Barber, Hamilton B.; Mathias, Andrew A.; Ricard, Rhett D.; Wilkins, William W.; KDiamaduros@nexsenpruet.com; Rabon, Sheree M.; Werdenie, Sharon A.; Smith, Laura L.; Crum, Liz; Cynthia D. Nygord; Burchstead, Michael; tnicholson@elections.sc.gov; Lisle Traywick; La'Jessica Stringfellow; Kenny, Stephen J.; Shedd, Erica Wells; Ackbersingh-Teed, Angella; Gibson, Lisa; Mparente@nexsenpruet.com  
**Cc:** Gina Colarusso; Jeffery A. Fuisz; Chris Bryant; Stuart Naifeh; Paula Ramer; Allen Chaney; Madison Perez; Antonio Ingram; Adriel I. Cepeda Derieux; Michelle Charles; Samantha Osaki; Leah Aden; Sarah Gryll; John A. Freedman; Rodney Ellis; Andrew Hirschel; John Hindley; Rick Rozos  
**Subject:** RE: SC NAACP v. Alexander - Plaintiffs' First Supplemental Initial Disclosures regarding Congressional Map  
**Attachments:** Plaintiffs' Initial Disclosures Regarding Congressional Map 3.29.22.pdf; Plaintiffs' First Supplemental Disclosures for Congressional Map 7.13.22\_final.pdf

Thank you for confirming that Plaintiffs intend to call these seven newly disclosed individuals as witnesses at trial and do not intend to withdraw their Second Supplemental Initial Disclosures.

Your email contains at least two misstatements. First, your initial disclosures have not “generically identified branch presidents as potential witnesses.” Neither Plaintiffs’ Initial Disclosures nor First Supplemental Initial Disclosures did so. I have reattached those documents for your reference.

Second, adding seven new witnesses will, in fact, “disrupt trial” and the schedule for all parties to prepare for trial. You have offered no support for your assertion otherwise; nor could you, since this is a significant increase in the number of anticipated witnesses served only 3 days before the close of discovery.

Unfortunately, Plaintiffs still have not attempted to articulate a good-faith basis for the late disclosure. That the witnesses are “important” to Plaintiffs’ case only underscores that they should have been disclosed earlier, particularly since these individuals were known to Plaintiffs. Moreover, if these individuals were mentioned in documents, Plaintiffs could and should have disclosed them earlier. And any mention of these individuals in President Murphy’s deposition also is not a timely disclosure because that deposition took place only 4 days before the discovery deadline. *See Haynes v. South Carolina Waste, LLC*, 2022 WL 2595243, \*2 (D.S.C. July 6, 2022) (Childs, J.).

As for Mr. Davis, in particular, Plaintiffs have not provided a coherent explanation of the substance of his testimony. To the extent Mr. Davis intends to offer testimony about “the impact of the redistricting process on South Carolina’s communities” in general, as opposed to his own specific community, that sounds like a backdoor attempt at belatedly disclosing a purported expert. Plaintiffs’ deadline for disclosing experts was April 4, 2022. *See* ECF No. 180, at 2. Plaintiffs have not articulated any good cause for a four-month delay in identifying this individual, nor could they.

Once again, we believe the appropriate path forward is for Plaintiffs to withdraw their untimely Second Supplemental Initial Disclosures rather than forcing the issue to motions practice.

Thanks.

John M. Gore  
Partner

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**From:** Raymond Audain <raudain@naacpldf.org>

**Sent:** Wednesday, August 10, 2022 2:02 PM

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**Subject:** RE: SC NAACP v. Alexander - Plaintiffs' First Supplemental Initial Disclosures regarding Congressional Map

**\*\* External mail \*\***

We will address later your baseless accusations of bad faith and your unhinged speculation. For now, please be advised that we have no reason to withdraw our supplemental disclosures. Under Federal Rule of Civil Procedure 26, we have a duty to supplement. With respect to the local rule, the testimony of these witnesses is important and won't disrupt trial. If you need to depose them after the close of discovery, we'll join you in seeking leave of the court do so, so you'll suffer no prejudice. Moreover, our initial disclosures generically identified branch presidents as potential witnesses, and those presidents' names have appeared in meeting minutes and/or were referenced during President Murphy's deposition. Please be further advised that Anjene Davis does not work for LDF. By including LDF's address under his name, we're indicating that communications directed to Mr. Davis can be made "care of" LDF.

**From:** Gore, John M. <jmgore@jonesday.com>

**Sent:** Tuesday, August 9, 2022 5:05 PM

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**Subject:** RE: SC NAACP v. Alexander - Plaintiffs' First Supplemental Initial Disclosures regarding Congressional Map

[Caution: EXTERNAL EMAIL]

Counsel:

Plaintiffs' Second Supplemental Disclosures—which purport to disclose 7 new potential witnesses three days before the close of discovery—violate the local rules and evince bad faith.

Local Rule 16.02(D)(2) provides:

“Witnesses who are not timely identified may be excluded. All witnesses should be identified as early in the discovery process as feasible. Witnesses identified within the last twenty-eight (28) days of the discovery period will be presumed not to be timely identified, absent a showing of good cause.”

Plaintiffs have offered no cause, let alone good cause, for the belated attempt to identify 7 new potential witnesses now. Nor could any good cause exist for several reasons.

First, all of these newly disclosed individuals are officers or employees of the named plaintiff SC NAACP or plaintiffs' counsel, NAACP LDF. Indeed, six of the newly disclosed individuals are members of “Executive leadership of the South Carolina State Conference of the NAACP.” Second Supp. Disclosures A.1.a. The other, Anjene Davis, is with “NAACP Legal Defense and Education Fund.” Second Supp. Disclosures A.8. Accordingly, these individuals are all well-known to the plaintiffs, and plaintiffs should have disclosed them months ago if, in fact, these individuals possess information relevant to this lawsuit.

Second, the SC NAACP has balked at disclosing its membership list or other information regarding its members as necessary to establish standing. The Senate Defendants and the House Defendants have worked with the SC NAACP to accommodate its concerns. For the SC NAACP now to claim that its members have relevant information contradicts its earlier position and does not display the kind of good faith Defendants have shown or required by the Rule.

Third, LDF fought back against the House Defendants' subpoena during the House Plan litigation, asserting that LDF did not possess relevant information and/or was protected by attorney-client privilege. The disclosure of Anjene Davis contradicts that position as well. Moreover, the timing of this disclosure evinces bad faith: there is now not enough time to subpoena LDF for documents and information before discovery closes. LDF had every reason to know of Anjene Davis—and the Defendants' interest in subpoenaing relevant documents—but it has stonewalled the Defendants and waited to disclose Anjene Davis until after Defendants no longer can serve a subpoena in a timely fashion.

The prejudice of Plaintiffs' belated disclosures to Defendants is obvious: discovery is about to close, and there is no longer time to conduct discovery into these individuals or the information they may possess.

We also note that while Plaintiffs' First Supplemental Initial Disclosures highlighted changes, the Second Supplemental Initial Disclosures did not. Accordingly, we are not certain whether Plaintiffs have made other changes. We object to any and all such changes as well.

We believe that it is in all parties' best interest not to burden the court with this issue. We therefore request that Plaintiffs withdraw their Second Supplemental Initial Disclosures. Please notify us no later than 2pm on Wednesday, August 10, whether you will do so. We reserve our rights to seek relief from the court if we do not hear from you.

Best,  
John

John M. Gore  
Partner

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**Sent:** Tuesday, August 9, 2022 9:51 AM

**To:** Santino Coleman <[scolem@naacpldf.org](mailto:scolem@naacpldf.org)>; Trinkley, Jane <[JTrinkley@burr.com](mailto:JTrinkley@burr.com)>; MMoore@nexsenpruet.com; Rob Tyson <[rtyson@robinsongray.com](mailto:rtyson@robinsongray.com)>; Hollingsworth, Jennifer J. <[JHollingsworth@nexsenpruet.com](mailto:JHollingsworth@nexsenpruet.com)>; Barber, Hamilton B. <[HBarber@nexsenpruet.com](mailto:HBarber@nexsenpruet.com)>; Mathias, Andrew A. <[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)>; Ricard, Rhett D. <[RRicard@nexsenpruet.com](mailto:RRicard@nexsenpruet.com)>; Wilkins, William W. <[BWilkins@nexsenpruet.com](mailto:BWilkins@nexsenpruet.com)>; KDiamaduros@nexsenpruet.com; Rabon, Sheree M. <[SRabon@nexsenpruet.com](mailto:SRabon@nexsenpruet.com)>; Werdenie, Sharon A. <[SWerdenie@nexsenpruet.com](mailto:SWerdenie@nexsenpruet.com)>; Smith, Laura L. <[LSmith@nexsenpruet.com](mailto:LSmith@nexsenpruet.com)>; Crum, Liz <[lcrum@burr.com](mailto:lcrum@burr.com)>; Cynthia D. Nygord <[cnygord@robinsongray.com](mailto:cnygord@robinsongray.com)>; Burchstead, Michael <[mburchstead@burr.com](mailto:mburchstead@burr.com)>; [tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov); Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; La'Jessica Stringfellow <[lstringfellow@robinsongray.com](mailto:lstringfellow@robinsongray.com)>; Kenny, Stephen J. <[skenny@jonesday.com](mailto:skenny@jonesday.com)>; Shedd, Erica Wells <[EShedd@NexsenPruet.com](mailto:EShedd@NexsenPruet.com)>; Ackbersingh-Teed, Angella <[aackbersingh-teed@burr.com](mailto:aackbersingh-teed@burr.com)>; Gibson, Lisa <[LGibson@burr.com](mailto:LGibson@burr.com)>; [Mparente@nexsenpruet.com](mailto:Mparente@nexsenpruet.com); Gore, John M. <[jmgore@jonesday.com](mailto:jmgore@jonesday.com)>

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**Subject:** RE: SC NAACP v. Alexander - Plaintiffs' First Supplemental Initial Disclosures regarding Congressional Map

**\*\* External mail \*\***

Counsel,

Please find attached Plaintiffs' Second Supplemental Disclosures. Please note that we have expanded the list of individuals in 1(a), added Mr. Anjene Davis as 8(g), and added the highlighted language to paragraph 8:

*Third-party individuals and organizations focused on redistricting, including their members, employees, and agents, who may have information on the redistricting process in South Carolina and the impact of the redistricting process on South Carolina's communities, including, but not limited to:*

Sincerely,  
Raymond Audain

**From:** Santino Coleman <[scolem@naacpldf.org](mailto:scolem@naacpldf.org)>

**Sent:** Wednesday, July 13, 2022 9:03 AM

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**Subject:** SC NAACP v. Alexander - Plaintiffs' First Supplemental Initial Disclosures regarding Congressional Map

Counsel:

Attached please find Plaintiffs' First Supplemental Initial Disclosures. For ease, substantive changes/additions are highlighted in yellow.

**Santino Coleman**

**Assistant Counsel**

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